

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

<b>IN RE VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION</b>	<b>MDL No. 2875</b>
<b>THIS DOCUMENT RELATES TO:</b> <i>Roberts et al. v. Zhejiang Huahai Pharmaceutical Co. Ltd.,</i>  Case No. 1:20-cv-00946-RMB-SAK	<b>HON. RENÉE MARIE BUMB</b>

**PLAINTIFFS' NOTICE OF *DAUBERT* MOTION TO PRECLUDE  
OPINIONS OF DEFENSE EXPERT VICTORIA CHERNYAK, M.D., M.S.**

**PLEASE TAKE NOTICE**, Plaintiffs shall move before the Honorable Renée Marie Bumb, U.S.D.J., and the Honorable Thomas I. Vanaskie, Special Master, at the United States District Court for the District of New Jersey, 1 John F. Jerry Plaza, 4th and Cooper Streets, Camden, New Jersey, for an Order Precluding the Opinions of Defense Expert Victoria Chernyak, M.D., M.S..

**PLEASE TAKE FURTHER NOTICE** that Plaintiffs shall rely upon the Brief and Certification of C. Brett Vaughn RN, BSN, JD in support of the Motion.

**PLEASE TAKE FURTHER NOTICE** that Plaintiffs request oral argument pursuant to L. Civ. R. 78.1.

**NIGH GOLDBERG RASO  
& VAUGHN, PLLC**

*Attorneys for Plaintiffs*

Dated: May 22, 2025

By: /s/ C. Brett Vaughn

C. Brett Vaughn, RN, BSN, JD  
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**CERTIFICATE OF SERVICE**

I hereby certify that on May 22, 2025, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notifications of such filing to the CM/ECF participants registered to receive service in this MDL.

**NIGH GOLDENBERG RASO  
& VAUGHN, PLLC**  
*Attorneys for Plaintiffs*

By: /s/ C. Brett Vaughn